REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-40 are pending in this application. Claims 1, 16, 28, and 35 are independent. The remaining claims depend, directly or indirectly, from claims 1, 16, 28, and 35.

Drawings

Applicant respectfully requests the Examiner to accept the drawings filed on August 4, 2000, and the replacement sheet correcting the drawings filed on January 6, 2005.

Acknowledgement of Priority

Applicant respectfully requests the Examiner to acknowledge the claim for foreign priority in this application by indicating whether certified copies of the priority documents have been received.

Claim Amendments

Independent claims 1 and 16 have been amended by this reply to clarify and further define the phrases "manipulation means" and "manipulation protocol." Amended independent claims 1 and 16 now recite "wherein the manipulation means is a demultiplexer and a filter configured to filter the data received by the receiver/decoder, and wherein the manipulation protocol changes the filter to extract specific components of the received data." Support for this amendment to the claims may be found, for example, on page 4, lines 5-11 of the Specification.

Rejections under 35 U.S.C. 102

Claims 1-3, 6, 12-13, 16-18, 21, and 27 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Publication No. 2002/0044658 ("Wasilewski"). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

The claimed invention relates to providing a device for use in a receiver/decoder that is operable with different conditional access systems (*See* Specification, page 3, lines 19-21), where the device is configured to provide an efficient means of configuring a manipulation protocol to enable data from different conditional access systems to be downloaded (*See* Specification, page 4, lines 12-15). More specifically, in one embodiment of the invention, received data is manipulated *by filtering* (*i.e.,* extracting) specific components of the received data, based on at least one parameter provided to the filter, where the parameter is specific to a particular one of several conditional access systems in the receiver/decoder. Accordingly, amended independent claim 1 now recites wherein the manipulation means is a demultiplexer and a filter configured to filter the data received by the receiver/decoder, and wherein the manipulation protocol changes the filter to extract specific components of the received data.

Advantageously, the device of the claimed invention eliminates the need to update the components of the receiver/decoder which perform manipulation of received data each time parameters of the conditional access system change, or each time the conditional access system itself is changed.

For anticipation under 35 U.S.C. 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. The Applicant respectfully asserts that Wasilewski does not disclose or

suggest a receiver/decoder comprising a device suitable for several different conditional access systems, that configures a filter to filter specific components of received data. Further, Wasilewski fails to disclose or suggest that the filter is configured based on at least one parameter associated with a particular conditional access system.

In contrast to the claimed invention, Wasilewski discloses a cable television system that provides conditional access to services. The cable television system includes a headend from which service "instances," or programs, are broadcast and a plurality of set top units for receiving the instances and selectively decrypting the instances for display to system subscribers. The service instances are encrypted using public and/or private keys provided by service providers or central authorization agents (*See* Wasilewski, Abstract).

Wasilewski is completely silent with respect to filtering or extracting specific components of received data. In fact, the Examiner cites paragraph [0139] of Wasilewski, which states "DHCTSE 627 uses the entitlement information to determine whether DHCT 333 receiving the ECM has an entitlement for the instance of the service which the ECM accompanies; if it does, DHCTSE 627 processes the ECM, and provides the control word to service decryptor module 625 in a form that it may use to decrypt or descramble services," as disclosing the manipulation means and the manipulation protocol. Wasilewski discloses decrypting and descrambling data in order to provide the service instances to subscribers, based on what the subscription conditions of a given subscriber are. Clearly, the claims as amended clarify that the manipulation means refers to filtering and extracting specific components of received data, and not to decrypting and descrambling of received data. Neither the cited portion of Wasilewski, nor any of the rest of Wasilewski, discloses filtering (*i.e.,* extracting) received

data based on a parameters associated with a particular conditional access system, as required by amended independent claim 1.

Further, Wasilewski fails to disclose or suggest a "means for receiving a command instructing configuration of the manipulation protocol in dependence on the conditional access system." The command received by the device in the receiver/decoder allows the device to *configure the filter* to filter specific components of the received data, *based on a particular conditional access system.* In contrast, the cited portion of Wasilewski discloses EA modification information for modifying the authorization information for the entitlement agent in DHCT (*See* Wasilewski, [0089]). Wasilewski discloses nothing regarding dependence on a particular conditional access system, nor does Wasilewski disclose any type of filtering of specific components of the received data. Modifying authorization information is clearly distinct from filtering specific components, where the filtering is performed based on one of several conditional access systems.

Similarly, Wasilewski also cannot possibly disclose the limitation "outputting said parameter to the manipulation means for use in configuring the manipulation protocol, whereby the manipulation means is not required to receive all parameters necessary to configure the manipulation protocol in dependent on all of the conditional access systems." The parameter outputted represents a parameter specific to a particular conditional access system, and the device in the receiver/decoder uses this parameter to configure the filter to filter only the specific components of the received data that are necessary for the particular conditional access system. Wasilewski does not even contemplate this type of parameter specific to a conditional access system, and definitely fails to disclose or suggest configuring a filter and filtering received data based on the parameter associated with a particular conditional access system. In fact, the cited

portion of Wasilewski only discloses that DHCTSE uses the entitlement information to determine whether DHCT receiving the ECM has an entitlement for the instance of the service which the ECM accompanies. If the DHCT has an entitlement for the service instance, then the DHCTSE processes the ECM and provides the control work to a service decryptor module for decryption of the data. Making a decision based on subscription information as to whether or not to process an ECM is clearly distinct from filtering/extracting specific components of received data. In Wasilewski, nothing is extracted. Either a subscriber has authorization to a service instance, or the subscriber does not have authorization to receive the service instance. No filtering or extraction of received data based on at least one parameter (but not all parameters) of a particular conditional access system is performed in Wasilewski.

In view of the above, it is clear that Wasilewski fails to disclose each and every element of amended independent claim 1. Dependent claims 2-3, 6, and 12-13 are patentable for at least the same reasons. Further, amended independent claim 16 includes similar allowable subject matter, and is patentable over Wasilewski for at least the same reasons as independent claim 1. Dependent claims 17-18, 21, and 27 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. 103

Claims 4-5, 7, 19-20, 22, 28-29, 33-36, and 40 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Wasilewski in further view of U.S. Patent No. 5,796,829 ("Newby"). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

With respect to claims 4-5, 7, 19-20, and 22, as described above, Wasilewski fails to anticipate amended independent claims 1 and 16. Further, Newby fails to provide that which Wasilewski lacks. In particular, Newby relates to an access control processor for a conditional access system in which encrypted information segments provided by a plurality of information service providers are encrypted for transmission (*See* Newby, Abstract). Newby fails to disclose or suggest configuring a filter to extract specific components of received data based on at least one parameter associated with a specific conditional access system. Further, Newby fails to disclose or suggest a device for use in a receiver/decoder that is configured to receive a command that allows the device to configure the filter based on a specific conditional access system. Newby is also silent with respect to outputting a parameter (but not all parameters) associated with a particular conditional access system for use in configuring the filter.

Thus, it is clear that Wasilewski and Newby, whether considered separately or in combination, fail to render amended independent claims 1 and 16 obvious. Thus, dependent claims 4-5, 7, 19-20, and 22 are patentable over Wasilewski and Newby for at least the same reasons.

With respect to independent claims 28 and 35, the claims have been amended to recite wherein manipulating data received by the receiver/decoder comprises filtering the received data to extract specific components of the received data. As described above, Wasilewski fails to disclose or suggest any type of filtration/extraction of received data as required by the amended claims. Further, Newby fails to provide that which Wasilewski lacks. Newby is completely silent with respect to a manipulation means being a filter, and a manipulation protocol that configures the filter to extract received data based on at least one parameter associated with a particular conditional access system.

Thus, it is clear that amended independent claims 28 and 35 are patentable over Wasilewski and Newby, whether considered separately or in combination. Dependent claims 29, 33-34, 36 and 40 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 8-11, 14-15, and 23-26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Wasilewski in view of U.S. Patent No. 5,973,684 ("Brooks"). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

As described above, Wasilewski fails to disclose the limitations of amended independent claims 1 and 16. Further, Brooks fails to supply that which Wasilewski lacks. In particular, Brooks relates to an apparatus and method for selectively executing a resident terminal application and an information provider-specific application stored in a digital entertainment terminal adapted to decode broadband data signals from a video dial tone network (*See* Brooks, Abstract). Brooks is completely silent with respect to filtering received data to extract components specific for a conditional access system using a device in a receiver/decoder.

In view of the above, it is clear that Wasilewski and Brooks, whether considered separately or in combination, fail to render amended independent claims 1 and 16 as obvious. Thus, claims 1 and 16, as amended, are patentable over Wasilewski and Brooks. Dependent claims 8-11, 14-15, and 23-26 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 30-32 and 37-39 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Wasilewski in view of Newby and Brooks. To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

As described above, none of Wasilewski, Newby, and Brooks disclose the limitations of the amended independent claims 28 and 35. In particular, none of Wasilewski, Newby, and Brooks discloses or suggests a device for use with a receiver/decoder that is configured to enable a filter to extract specific components of received data for a particular conditional access system based on at least one parameter of the particular conditional access system.
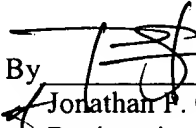
In view of the above, it is clear that none of Wasilewski, Newby, and Brooks, whether considered separately or in combination, render the amended independent claims 28 and 35 as obvious. Dependent claims 30-32 and 37-39 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 11345.024001).

Dated: July 29, 2005   Respectfully submitted,

By _____

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